

**From:** [Halasz, Stephen \(Austin,TX-US\)](#)  
**To:** [Gary Moore/R6/USEPA/US@EPA](#)  
**Subject:** RE: sludge  
**Date:** 08/15/2011 07:50 AM

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Gary,

From what I'm told it's not the waste code that's a problem it's the benzene concentration, which could be lowered by agitating the sludge. The K169 waste code is correct.

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**From:** Moore.Gary@epamail.epa.gov [mailto:Moore.Gary@epamail.epa.gov]  
**Sent:** Monday, August 15, 2011 7:47 AM  
**To:** Halasz, Stephen (Austin,TX-US)  
**Subject:** Re: sludge

Steve:

I think you need to check with the following first. Also, I don't think those options are available to you because it is a K169 waste and carries that code even after treatment. I will confirm with our RCRA folks.

Clean Harbors, La Porte, TX, 781-792-5112, Mike Wiles  
Veolia ES, Port Arthur, TX, 225-907-8296, Allison Wisener  
PSC, Avalon, TX, 713-817-0025, Mike Rosenstein

Thanks  
Gary

Gary Moore  
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EPA Region 6  
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**From:** "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>  
**To:** Gary Moore/R6/USEPA/US@EPA  
**Cc:** Richard Bergner <rbergner@rflaw.net>, Alonzo Arredondo <alonzogarredondo@gmail.com>, "cwills@gaincoinc.com" <cwills@gaincoinc.com>  
**Date:** 08/15/2011 06:55 AM  
**Subject:** sludge

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Gary,

Due to the high cost of sludge disposal would be willing to have a discussion about treating the sludge on site until the sludge was no longer hazardous? Options for staging the sludge include removing the top on Tank 2,



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which is on the north property and putting the sludge in that tank. That way we could transfer the sludge from Tanks 10, 27 and 30 immediately and then Tank 26 after we dewater the tank. Other options include building a double lined cell to hold the sludge.

Let me know if either of these options are available.

Stephen Halasz P.G.

Program Manager



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